

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AURELIO MONTANO,

Plaintiff,

vs.

WEXFORD HEALTH SOURCES, INC., LESLIE  
WILKING, and MARLENE HENZE

Defendants.

CASE NO. 21-CV-06867

JUDGE ANDREA R. WOOD

**JOINT MOTION FOR EXTENSION OF EXPERT DISCOVERY DEADLINES**

NOW COME, Plaintiff Aurelio Montano (“Plaintiff”), by counsel, and Defendants Wexford Health Sources, Inc. (“Wexford”), Leslie Wilking, and Marlene Henze, by counsel (collectively, the “Parties”), and respectfully request an extension of case management deadlines.

In support thereof, the Parties state as follows:

1. On February 3, 2025, the Court entered its order extending the expert discovery deadline. Expert discovery is set to end June 13, 2025. (ECF No. 103.)
2. On March 31, 2025, the Court dismissed Plaintiff’s claims against Wexford. (ECF 111.)
3. On May 2, 2025, after receiving leave from the Court, Plaintiff filed his Third Amended Complaint, which reasserted claims against Wexford and the individual defendants. (ECF 116.)
4. On June 3, 2025, the Court issued its order extending the fact discovery deadline to July 31, 2025. (ECF No. 120.) The June 3 Order was silent on the deadline for expert discovery, which is thus still set to close June 13, 2025. (*See* ECF No. 103.)

5. In light of the extended deadline for fact discovery related to the Third Amended Complaint, the Parties jointly request an extension of the expert discovery deadline as follows:

<b>Event</b>	<b>Current deadline (ECF 103)</b>	<b>Proposed Schedule</b>
Plaintiff's Expert Disclosure and Service of Report	March 31, 2025	August 15, 2025
Defendants' Expert Disclosure and Service of Report	May 12, 2025	September 15, 2025
Close of Expert Discovery	June 13, 2025	October 3, 2025
Dispositive Motion Deadline	June 30, 2025	November 3, 2025

6. There is good cause for this request. The current deadlines cannot be met despite the reasonable diligence of the parties, and neither party will be prejudiced by an extension of these deadlines.

WHEREFORE, the Parties, jointly and by counsel, respectfully request the Court grant their joint request for an extension of the applicable case management deadlines and for all other just and proper relief.

DATED: June 13, 2025

**WEXFORD HEALTH SOURCES,  
INC., LESLIE WILKING,  
MARLENE HENZE,**

By: /s/ Bryan R. Findley  
One of Their Attorneys

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**AURELIO MONTANO**

By: /s/ Jane Moyer-Rowley  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2025, I will electronically file the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system.

/s/ Jane Moye-Rowley  
Jane Moye-Rowley